

SEP 4 1979

MEMORANDUM

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTIONINFO. from
review of NJDEP
filesFriedman
file

TO: Haig Kasabach

FROM: George Klepp (through) W. Althoff & Frank Markewicz (GWMS)

SUBJECT: L.E. Carpenter Meeting July 25, 1979

DATE: August 9, 1979

On July 25, 1979 a meeting was held at L.E. Carpenter to discuss the removal of chemical waste on the site and the installation of ground-water monitor wells. Beside myself, Department representatives were: Patricia Skelly, Office of Regulatory Affairs; Peter Lynch, Robert Plumb, and Moxon Tan of Passaic Basin, M.S. & E.. F. Jay Singleton, Henry Jarret, and Theodore Schwartz represented L.E. Carpenter. Robert D. Mutch of Wehran Engineering was also present as technical advisor for Carpenter.

At the meeting, Carpenter (Schwartz) expressed its desire to remove the chemical waste from the site as soon as possible, but would not undertake the installation of any ground-water monitor wells as part of the operation.

According to Mutch, Wehran is presently conducting a series of tests on a sludge sample to determine the exact nature of the material. Wehran believes that this characterization is necessary to ensure complete safety during the excavation of the material. Before the results of the sludge characterization is complete, Wehran cannot formulate a final removal plan. A very tentative plan, based on no unexpected chemicals in the sludge, was outlined by Jarret and Mutch.

Two points must be considered before an operation like this can proceed: the de-watering of the excavation site, and the disposal of the waste material. The disposal should present no major problem since the sludge characterization will provide a complete chemical break-down and a disposal facility will surely be found since Carpenter contends that price is no object and will spend whatever is necessary "to get rid of the stuff."

The tentative de-watering plan appears to be quite inadequate. The plan entails the excavation of a pit to collect ground water, "... since water flows to the lowest point," according to Jarret. A skimmer pump would be employed to collect "all" of the contamination that "may" be present.

Without pumping the water out of the ground into some type of holding tank, there will be no reduction in the water elevation. If the pit is the only "de-watering" mechanism, the water levels will not significantly drop since stabilization will occur rapidly. It is also doubtful that a skimmer would collect "all" the contaminants since chemical analysis of water on the site indicate the presence of materials which are miscible with water, (see attached list). There is also evidence that some material on the site may actually be heavier than water. On the bottom of the discontinued filter bed, a cloudy layer of material is apparent. When a stone is tossed into the liquid it stirs up the bottom layer but the material quickly settles with no indication that the stone passed through the layer.

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It is the opinion of this writer that the old sludge material may not be the sole source of contaminants on the site. Given the deplorable conditions found on the facility upon initial inspection and the nature of the product, it is conceivable that the sludge is not the only potential source of contaminants (see memos- 5/2 & 5/17/79). Sample analysis of material collect by Killam Associates (1/4/79) indicates the presence of Xylene in water from a series of ditches on the east side of the facility, (see attachment). A stream discharge, also on the east side of the plant, sampled by M.S. & E. on May 7, 1976, also indicated the presence of Xylene in the water at considerable concentration levels - 1066 ppb Total Xylene (see attachment). The water from this seep discharges into a drainage ditch which enters into the Rockaway River.

While there is no proof of ground-water contamination off of the site, there is strong evidence that the water is polluted under the site (see attached memos). The presence of the chemical waste on the site requires the installation of monitor wells to determine the nature and extent of any pollution.

The position of Carpenter in this matter is not in line with the recommendations made by the writer in May (see attached memo, 5/17/79). Without monitor wells on the site, it would be impossible to determine whether any contaminants are liberated during the excavation process. To further necessitate the installation of monitor wells is the possibility that the sludge is not the only source of contamination.

Carpenter has suggested that they may reconsider their position on the monitor wells, but only after the sludge has been removed. This proposal cannot be considered seriously since there is no reason to believe that the company will install wells after the source of contamination has been removed.

The position that the Department takes in this matter must consider the following:

- The proposed monitor wells must be installed. If the company refuses to relent in its position, a court order should be obtained and the Department install the wells. Patricia Skelly of O.R.A. indicates that grounds do exist for such an action.
- The excavation of the sludge material must not be allowed unless a workable de-watering plan is developed and approved by this Office.
- A representative of the Department should observe the excavation process.

GK:mf

cc: Peter Lynch
Patricia Skelly